

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI**

NELSON GOMES, individually, derivatively)
and on behalf of all others similarly situated,)

Plaintiff,)

v.)

Case No. 4:10-cv-00083-SOW

AMERICAN CENTURY COMPANIES, INC.;)
AMERICAN CENTURY GLOBAL)
INVESTMENT MANAGEMENT, INC.;)
JAMES E. STOWERS, JR.; JAMES E.)
STOWERS, III; JONATHAN S. THOMAS;)
THOMAS A. BROWN; ANDREA C. HALL;)
DONALD H. PRATT; GALE E. SAYERS;)
M. JEANNINE STRANDJORD; TIMOTHY S.)
WEBSTER; WILLIAM M. LYONS; ENRIQUE)
CHANG; MARK KOPINSKI; AND BRIAN)
BRADY,)

Defendants,)

AMERICAN CENTURY WORLD MUTUAL)
FUNDS, INC., doing business as AMERICAN)
CENTURY INTERNATIONAL DISCOVERY)
FUND,)

Nominal Defendant.)

**MOTION TO DISMISS PLAINTIFF’S VERIFIED
DERIVATIVE AND CLASS ACTION COMPLAINT**

Pursuant to Federal Rules of Civil Procedure 12(b)(6) and 23.1, Defendants Thomas A. Brown, Andrea C. Hall, Donald H. Pratt, Gale E. Sayers, M. Jeannine Strandjord, and Timothy S. Webster and nominal defendant American Century World Mutual Funds, Inc., doing business as American Century International Discovery Fund (hereinafter “Defendants”), respectfully move this Court to dismiss Plaintiff’s Verified Derivative and Class Action Complaint with prejudice, and for any other relief the Court deems just and proper.

In support of this Motion, Defendants state as follows:

1. Plaintiff's direct claims should be dismissed because any alleged injury is derivative, not direct; and
2. Plaintiff's derivative claims should be dismissed because he fails sufficiently to plead demand futility.

Suggestions in Support of this Motion are filed herewith and are incorporated by reference.

Dated: August 15, 2011

Respectfully submitted,

BERKOWITZ OLIVER WILLIAMS
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Defendant American Century World
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American Century International
Discovery Fund